From: **MCCLINCY Matt** 

To: Jean Lee; Sean Sheldrake/R10/USEPA/US@EPA

Cc: cyril.young@dsl.state.or.us; earoth@parametrix.com; greg m smith@fws.gov; PETERSON Jenn L;

jeremy buck@fws.gov; ANDERSON Jim M; jhowland@parametrix.com; Kemper McMaster@fws.gov; John

Malek/R10/USEPA/US@EPA; POULSEN Mike; OMEALY Mikell; Nancy.Munn@noaa.gov;

pbattuello@parametrix.com; Lori Cora/R9/USEPA/US@EPA; Dana Davoli/R10/USEPA/US@EPA; Rene Fuentes/R10/USEPA/US@EPA; Joe Goulet/R10/USEPA/US@EPA; Sylvia Kawabata/R10/USEPA/US@EPA; Chip Humphrey/R10/USEPA/US@EPA; Eric Blischke/R10/USEPA/US@EPA: Kristine Koch/R10/USEPA/US@EPA;

Socorro Rodriguez/R10/USEPA/US@EPA; Burt Shephard/R10/USEPA/US@EPA; Judy

Smith/R10/USEPA/US@EPA; (b) (6) ; audiehuber@ctuir.com; BBarquin@hk-law.com; cunninghame@gorge.net; craig.christian@eiltd.net; emadden@ecoisp.com; jeff.baker@grandronde.org; Lisa.Estensen@grandronde.org; ward@yakama.com; raygivens@givenslaw.com; tomd@ctsi.nsn.us; Valerie.lee@eiltd.net; KEPLER Rick J; STRUCK Rodney; Robert.Neely@noaa.gov; PURCHASE Steve

Subject: RE: Fw: Arkema Key Topics and Comments

Date: 10/21/2005 08:21 AM

Hi Jean,

I am sorry I was unable to participate in the discussions on Wednesday. Jim Anderson mentioned the discussion the group had about the elevated DDT concentrations upstream of Dock 1 and the speculation about another source (e.g., discharge pipe). It is always important to continue to check the data against the conceptual site model. In this case, I think ARKEMA's model can explain the elevated DDT upstream of Dock 1 without another discharge point.

The DDT data map you attached, which I am assuming included the same data Jordan was using, does not include the data from the Phase I and II ARKEMA in water investigation data. The location of the outfall pipe that ARKEMA suspects that the initial DDT manufacturing process waste was discharged through is just down stream (approximately 100 feet ) of the access to Dock 1. The ARKEMA Phase I and II sediment data detected much higher DDT concentrations in sediment in this area than are reflected in the LWG data presented on the figure you attached. For example:

 $4,500,000~\rm ug/Kg$  at WB-9 at 8 to 10 feet  $3,500,000~\rm ug/Kg$  at WB-24 at 10.6 to 12.6 feet 920,000 ug/Kg at WB-8 at 6.8 to 9.3 feet.

Looking at the DDT concentrations in the former DDT process waste pond gives some idea of what the DDT concentrations probably were in the waste that was dischared through the outfall. DDT concentrations in the process waste pond range from 10,000,000 to 100,000,000 ug/Kg (note much of this has been removed by ARKEMA). When the LWG and ARKEMA sediment data sets are looked at together, I think one can extend the DDT foot print from the outfall source area upstream of Dock 1 and account for the DDT concentrations observed especially when one considers the up and downstream sediment dynamics, prop wash from ocean going ships and tugs that used the docks and construction of the newer docks.

The December 2003 Phase II Stage 1 and 2  $\rm In-River$  Groundwater and Sediment Investigation Report did a much better job of presenting a picture of the distribution of DDT in sediment than the  $\rm EE/CA$  work plan. It amazingly even includes isoconcentration plots of the data.

Anyway, let me know if you have any questions.

Matt McClincy DEQ ARKEMA Project Manager

----Original Message---From: Jean Lee [mailto:jean.lee@eiltd.net]
Sent: Thu 10/20/2005 12:39 PM
To: Sheldrake.Sean@epamail.epa.gov
Cc: cyril.young@dsl.state.or.us; earoth@parametrix.com; greg\_m\_smith@fws.gov; PETERSON Jenn L;
jeremy\_buck@fws.gov; ANDERSON Jim M; jhowland@parametrix.com; Kemper\_McMaster@fws.gov;
malek.john@epamail.epa.gov; MCCLINCY Matt; POULSEN Mike; OMEALY Mikell; Nancy.Munn@noaa.gov;
pbattuello@parametrix.com; cora.lori@epamail.epa.gov; davoli.dana@epamail.epa.gov;
fuentes.rene@epamail.epa.gov; goulet.joe@epamail.epa.gov; kawabata.sylvia@epamail.epa.gov;
Humphrey.Chip@epamail.epa.gov; blischke.eric@epamail.epa.gov; Koch.Kristine@epamail.epa.gov;
R amail.epa.gov; shephard.burt@epamail.epa.gov; smith.judy@epamail.epa.gov;

(b) (6) audiehuber@ctuir.com; BBarquin@hk-law.com; cunninghame@gorge.net;
craig.christian@eiltd.net; emadden@ecoisp.com; jeff.baker@grandronde.org;
Lisa.Estensen@grandronde.org; ward@yakama.com; raygivens@givenslaw.com; tomd@ctsi.nsn.us;
Valerie.lee@eiltd.net; KEPLER Rick J; STRUCK Rodney; Robert.Neely@noaa.gov; PURCHASE Steve
Subject: Re: Fw: Arkema Key Topics and Comments

Hi Sean and Peter,

It came up at the TCT meeting yesterday that we were surprised how much DDT contamination in sediments showed up in the sediments south of Dock 1 (not between Docks 1&2). This may be from filling activities. Since I was in the electronic version of the map today, anyway, I thought I would forward this info to you. It's unfortunate that the dock structures aren't shown on the Round 2 data, but I am pretty sure that Dock 1 is roughly between C356 and C359 (these cores are in-river of the actual dock). Note the total DDT concentration of 15,300 ppb in surface sediment at G360.

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>All,
>For tomorrow's telecon at 1pm, Non-
>let's meet in room 15M. We'll
>coordinate major comment direction.
                                                                                     Seattle office folks,
                                                                                ments received to date and
>thanks!
>S
>Sean Sheldrake
>Environmental Cleanup Office
>1200 Sixth Avenue
>Mailstop: ECL-110
>Seattle WA 98101-1128
>Seattle WA 98101-1128
>sheldrake.sean@epa.gov
>Phone: 206/553-1220  / Fax: 206/553-0124 or -0910
>http://yosemite.epa.gov/r10/oea.nsf/webpage/dive+team
>http://yosemite.epa.gov/r10/cleanup.nsf/sites/ptldharbor
>Deliveries: 9th floor mailroom
>Visitors: Check-in @ Service Center on 14th floor
>----- Forwarded by Sean Sheldrake/R10/USEPA/US on 10/17/05 09:57 AM
> - - - -
                         Kelli Warren
<KWarren@paramet
                         rix.com>
                                                                      Sean Sheldrake/R10/USEPA/US@EPA
                         10/14/05 02:57
                         РM
                                                                      Eric Roth
                                                                      <earoth@parametrix.com>
                                                                      epafile.Kirkland.DOM-KIRKLAND@par
ametrix.com, Ellen Watson
<ewatson@parametrix.com>
                                                                                                                    Subject
                                                                      Arkema Key Topics and Comments
>Sean,
>here is a message from Peter Battuello.
>Sean: here are the comments we've compiled to date. I've also included >a summary analysis grouped by key work area.
>1. Comments list is in order of document & section, with EECA general >topics at the end of the numbered sections. Also, I combined like >comments & deleted a few comments that were duplicates (from the same
>reviewer).
>2. Evaluated all of the comments by type of comment (e.g., editorial, >additional data needed, or major flaw) and then reviewed in depth the > "major flaws" and synthesized them into the comments on the word
>document attached.
>I think this will be a good basis for our discussion on Tuesday.
>Call me with comments/questions. Also forward as you see appropriate.
>PETER
>(See attached file: Arkema EECA Review Comments EW.xls)(See attached
>file: Arkema EECA Rvw cover letter topics.doc)
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